

## PURPOSE

Impact Financial Services Limited is committed to protecting the privacy and personal data of its clients, employees and business partners. This policy explains how the firm collects, processes, stores and protects personal data in accordance with the requirements of UK data protection legislation. The firm complies with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Guidance issued by the Information Commissioner's Office (ICO)

**The objective of this policy is to ensure that personal data is processed lawfully, fairly and securely.**

## SCOPE

This policy applies to:

- Mortgage Advisers
- Protection Advisers
- Managers and Supervisors
- Directors
- Employees and contractors

It applies to all personal data processed by the firm in connection with its business activities.

## DEFINITION OF PERSONAL DATA

Personal data refers to any information relating to an identified or identifiable individual. Examples include:

- name, address, contact details
- date of birth
- financial information
- employment details
- health information (where relevant for protection advice)

**Special category data, such as health information, requires additional safeguards.**

## DATA PROTECTION PRINCIPLES

The firm processes personal data in accordance with the following principles:

<b>Lawfulness, Fairness &amp; Transparency</b> Data must be processed lawfully and transparently	<b>Purpose Limitation</b> Collected for specific and legitimate purposes	<b>Data Minimisation</b> Only necessary data should be collected
<b>Accuracy</b> Must be accurate and kept up to date	<b>Storage Limitation</b> Not retained longer than necessary	<b>Integrity &amp; Confidentiality</b> Protected against unauthorised access or loss

## LAWFUL BASIS FOR PROCESSING

The firm processes personal data based on one or more lawful bases, including:

- performance of a contract with the client
- compliance with legal and regulatory obligations
- legitimate business interests
- client consent where required

Where special category data such as medical information is collected, explicit consent may be required.

## COLLECTION OF PERSONAL DATA

Personal data may be collected through:

- fact-find forms
- advice meetings
- client applications
- communication with clients
- documentation provided by the client

Clients are informed about how their data will be used through the firm's Privacy Notice.

## USE OF PERSONAL DATA

Personal data is used for purposes including:

- providing mortgage or protection advice
- assessing client needs and suitability
- submitting applications to product providers

- complying with regulatory obligations
- managing ongoing client relationships

The firm will not use personal data for purposes unrelated to its services without appropriate lawful basis.

## SHARING OF PERSONAL DATA

Personal data may be shared with third parties where necessary, including:

- mortgage lenders
- insurance providers
- compliance and regulatory authorities
- technology providers used by the firm
- professional advisers where required

All third parties receiving personal data are expected to maintain appropriate data protection standards.

## DATA SECURITY

The firm implements appropriate technical and organisational measures to protect personal data. Security measures include:

- restricted access to client information
- secure systems for data storage
- password protection and authentication controls
- secure handling of documentation

### ✔ Good Practice

- Client data stored only in authorised, encrypted systems
- Screens locked when leaving workstations unattended
- Sensitive documents shredded after use
- Data shared only via secure, approved channels

### ✘ Poor Practice

- Client information stored on personal devices or USB drives
- Sensitive data sent via unsecured email or messaging apps
- Documents containing personal data left visible on desks
- Sharing login credentials with colleagues

## DATA RETENTION

Personal data will be retained only for as long as necessary to comply with legal and regulatory obligations.

For regulated financial advice, records are typically retained for a minimum of **six years**.

After this period, data will be securely deleted or anonymised where appropriate.

## DATA SUBJECT RIGHTS

Individuals have rights under UK data protection law, including:

- the right to access their personal data
- the right to request correction of inaccurate data
- the right to request erasure in certain circumstances
- the right to restrict processing
- the right to data portability
- the right to object to certain types of processing

Requests relating to these rights will be handled in accordance with regulatory requirements.

## DATA BREACHES

**Any suspected data breach must be reported immediately to management.**

Examples of data breaches include:

- unauthorised disclosure of personal data
- loss of devices containing client information
- accidental sharing of sensitive information

Where required, the firm may notify the Information Commissioner's Office and affected individuals.

## TRAINING AND AWARENESS

All staff and advisers must understand their responsibilities regarding data protection. Training may include:

- data protection awareness
- secure handling of client information
- recognising and reporting data breaches

Compliance with this policy forms part of the firm's governance framework.

## MONITORING AND COMPLIANCE

The firm monitors compliance with this policy through:

- internal supervision
- system access controls
- compliance reviews

Where breaches of data protection rules occur, appropriate action will be taken.

## REVIEW OF THE POLICY

This policy will be reviewed:

- annually
- following regulatory changes
- following significant data protection incidents

Impact Financial Services Limited remains committed to protecting the privacy and security of personal data. All advisers, managers and staff must comply with this policy and ensure that client data is handled with the highest standards of care and confidentiality.

**Impact Financial Services Limited**

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